# NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Altec Industries, Inc. 5201 West 84<sup>th</sup> Street Indianapolis, IN 46268

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-12373-00256	
Issued by:	Issuance Date:
Mona A. Salem, Chief Operating Officer Department of Public Works, City of Indianapolis	

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## **SECTION A**

## **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

## A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a facility which coats metal truck parts.

Authorized Individual: Mr. Jeff Sills

Source Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268 Mailing Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268

Phone Number: (317) 872-3460

SIC Code: 3713 County Location: Marion

County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit

Minor Source, under PSD

## A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- One (1) Paint Booth, identified as PB 01, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 01. Installed 1991.
- 2. One (1) Paint Booth, identified as PB 02, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 02. Installed in 1993.
- 3. One (1) Paint Booth, identified as PB 03, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 03. Not yet installed.

## SECTION B GENERAL CONSTRUCTION CONDITIONS

## B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

## B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

## B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

## B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

## B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to

326 IAC 2-1.1-7(Fees) and the Code of Indianapolis and Marion County, Chapter 511.

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, and ERMD, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

## B.7 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

(a) Construction of PB-03 has not begun within eighteen (18) months from the effective date of this permit or if during the construction of PB-03, work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

## B.8 Local Agency Requirement

An application for an operation permit must be made ninety (90) days before start up to:

Environmental Resources Management Division Air Quality Management Section, Permits 2700 South Belmont Avenue Indianapolis, Indiana 46221

The operation permit issued by the Environmental Resources Management Division shall contain as a minimum the conditions in the Operation Conditions section of this permit.

### **SECTION C**

## **SOURCE OPERATION CONDITIONS**

## **Entire Source**

## C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of each criteria air pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

## C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions:
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

## C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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Altec Industries, Inc. Indianapolis, Indiana Permit Reviewer: Kevin Leone

> Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

> > and

Environmental Resources Management Division Air Quality Management Section, Permits 2700 South Belmont Avenue Indianapolis, Indiana 46221

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM and ERMD within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

## C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, ERMD U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

## C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, and ERMD shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

## C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and ERMD, the fact that continuance of this permit is not consistent with purposes of this article.

## C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

## **Testing Requirements**

## C.8 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division Air Quality Management Section, Permits 2700 South Belmont Avenue Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

## **Compliance Monitoring Requirements**

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- C.10 Compliance Monitoring Plan Failure to Take Response Steps [326 IAC 1-6]
  - (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
    - (1) This condition;
    - (2) The Compliance Determination Requirements in Section D of this permit;
    - (3) The Compliance Monitoring Requirements in Section D of this permit;
    - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
    - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMDupon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
      - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

## **Record Keeping and Reporting Requirements**

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

## C.12 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division Air Quality Management Section, Permits 2700 South Belmont Avenue Indianapolis, Indiana 46221

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

## C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

## C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating

procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

## C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division Air Quality Management Section, Permits 2700 South Belmont Avenue Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management Indiana Department of Environmental Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

and

Environmental Resources Management Division Air Quality Management Section, Data Compliance 2700 South Belmont Avenue Indianapolis, Indiana 46221

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

- 1. One (1) Paint Booth, identified as PB 01, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 01. Installed in 1991.
- 2. One (1) Paint Booth, identified as PB 02, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 02. Installed in 1993.
- 3. One (1) Paint Booth, identified as PB 03, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 03. Not yet installed.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## **Emission Limitations and Standards**

## D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each paint booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E =rate of emission of 0.55 pounds per hour; and P =process weight rate in tons per hour

## D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-1 (Surface Coating Emission Limitations), the input of VOC from PB-01, PB02, and PB03 shall be limited to 15 pounds per day each such that 326 IAC 8-2-9 shall not apply.

## **Compliance Determination Requirements**

## D.1.3 Volatile Organic Compounds (VOC)

Compliance with condition D.1.2 shall be demonstrated daily based on coating usage.

## D.1.4 Testing Requirements [326 IAC 2-6.1-5]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM and ERMD, compliance with the particulate limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring**

## D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 01, 02, and 03 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

## D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (3) below. Records maintained for (1) and (3) shall be taken daily and shall be complete and sufficient to establish compliance with the the VOC emission limits established in Condition D.1.2.
  - (1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used.
  - (2) The VOC content (weight percent) of each material used
  - (3) The weight of VOCs emitted for each compliance period, considering control efficiency.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

## D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## and

## INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

## **MSOP Quarterly Report**

Source Name: Altec Industries, Inc.

Source Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268 Mailing Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268

MSOP No: 097-12373-00256 Facility: Paint Booth PB-01

Parameter: Volatile Organic Compound (VOC)

Limit: 15 pounds per day

Month: Year: Column 1 Column 2 Column 3 Column 4 Column 5 Column 6 Material Daily VOC Total Total Daily VOC Daily VOC Total average, 2nd combined average combined combined average, 3rd VOC 2<sup>nd</sup> most recent VOC 3<sup>rd</sup> most recent VOC most most recent most recent month most recent month recent month month month month Total

9No deviation occurred in this month.

	9Deviation/s occurred in	this month.
Deviation h	as been reported on:	
Submitted by:		
Title/Position:		
Signature:		
Date:		

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## and

## INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

## **MSOP Quarterly Report**

Source Name: Altec Industries, Inc.

Source Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268 Mailing Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268

MSOP No: 097-12373-00256 Facility: Paint Booth PB-02

Parameter: Volatile Organic Compound (VOC)

Limit: 15 pounds per day

Month: Year: Column 1 Column 2 Column 3 Column 4 Column 5 Column 6 Material Daily VOC Total Total Daily VOC Daily VOC Total average, 2nd combined average combined combined average, 3rd VOC most VOC 2<sup>nd</sup> most recent VOC 3<sup>rd</sup> most recent most recent most recent month most recent month recent month month month month Total

9No deviation occurred in this month.

Deviation h	9Deviation/s occurred as been reported on:	in this month.
Submitted by: Title/Position:		
Signature:		
Date:		

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## and

## INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

## **MSOP Quarterly Report**

Source Name: Altec Industries, Inc.

Source Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268 Mailing Address: 5201 West 84<sup>th</sup> Street, Indianapolis, IN 46268

MSOP No: 097-12373-00256 Facility: Paint Booth PB-03

Parameter: Volatile Organic Compound (VOC)

Limit: 15 pounds per day

Month: Year: Column 1 Column 2 Column 3 Column 4 Column 5 Column 6 Material Daily VOC Daily VOC Daily VOC Total Total Total combined average, 2nd combined average, 3rd combined average VOC most most VOC 2<sup>nd</sup> most recent VOC 3<sup>rd</sup> most recent recent recent most recent month most recent month month month month month Total

9No deviation occurred in this month.

	9Deviation/s	occurred in th	iis month.	
Deviation h	as been report	ted on:		
	·			
Submitted by:				
Title/Position:				
Signature:				

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and

## INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

## MINOR SOURCE OPERATING PERMIT SEMI-ANNUAL COMPLIANCE MONITORING REPORT

	SEIVII-AININ	UAL COMP	LIANCE MONITORING REI	PORT
Source Name: Source Address: Mailing Address: MSOP No.:	Altec Industrie: 5201 West 84 <sup>t</sup> 5201 West 84 <sup>t</sup> 097-12373-00	Street, India Street India	anapolis, IN 46268 napolis, IN 46268	
	Months:	to	Year:	
in this permit. monitoring requ	This report shall irements and the descriptions. If no dev	be submitte date(s) of ead	ed semi-annually. Any dev ch deviation must be reporte	onitoring requirements stated viation from the compliance ed. Additional pages may be box marked "No deviations
9 NO DEVIATION	ONS OCCURRED	THIS REPO	RTING PERIOD.	
9 THE FOLLOV	VING DEVIATION	S OCCURRI	ED THIS REPORTING PER	RIOD.
	Monitoring Requirmit Condition D.1		Number of Deviations	Date of each Deviation
F	Title/Position:_			

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and

## INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

## MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Altec Industries, Inc.
Address:	5201 West 84 <sup>th</sup> Street
City:	Indianapolis, IN 46268
Phone #:	(317)872-3460
MSOP #:	097-12373-00256

I hereby certify that Altec Industries, Inc. is **9** still in operation. **9** no longer in operation.

I hereby certify that Altec Industries, Inc. is **9** in compliance with the requirements of MSOP 097-12373-00256.

9 not in compliance with the requirements of MSOP 097-12373-00256.

Authorized Individual (typed):
Title:
Signature:
Date:
If there are any conditions or requirements for which the source is not in compliance, provide a narrative

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:	

## **MALFUNCTION REPORT**

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC and to qualify for the exemption under 326 IAC 1-6-4.	<u>2 1-6</u>		
THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EN PARTICULATE MATTER?, 25 TONS/YEAR SULFUR DIOXIDE?, 25 TONS/YEAR NITRO 25 TONS/YEAR VOC?, 25 TONS/YEAR HYDROGEN SULFIDE?, 25 TONS/YEAR TOTAL?, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS?, 25 TONS/YEAR FLUORIDES? CARBON MONOXIDE?, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT?, COMBINATION HAZARDOUS AIR POLLUTANT?, 1 TONYYEAR LEAD OR LEAD COMPOUNDS ELEMENTAL LEAD?, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2)? EMISSIOI MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXAPPLICABLE LIMITATION	OGEN OX REDUC , 10 25 TON MEASU NS FROM	XIDES? CED SU 00TONS S/YEAF IRED AS M	LFUR S/YEAR R ANY
THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC OR, PERMIT CONDITION # PERMIT LIMIT OF		_AND/C	DR
THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREME		N Y	N
COMPANY:PHONE NO. (	)		
LOCATION: (CITY AND COUNTY)  PERMIT NO AFS PLANT ID: AFS POINT ID:			
INSP: CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND			
REASON:			
DATE/TIME MALFUNCTION STARTED:// 20 ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:		_ AM /	/ PM
DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE / / 20 /	AM/PM		
TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:			
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:			
MEASURES TAKEN TO MINIMIZE EMISSIONS:			
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:			
CONTINUED OPERATION REQUIRED TO PROVIDE <u>ESSENTIAL</u> * SERVICES:  CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:  CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:  INTERIM CONTROL MEASURES: (IF APPLICABLE)			
MALFUNCTION REPORTED BY:TITLE:TITLE:			
``````````````````````````````````````			
MALFUNCTION RECORDED BY:DATE:TIME:			

## Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

## 326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

## 326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\*Essential services are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:		

## Indiana Department of Environmental Management Office of Air Management

## and Indianapolis Environmental Resources Management Division

Addendum to the

Technical Support Document for an New Source Construction Permit and Minor Source Operating Permit

Source Name: Altec Industries, Inc.

Source Location: 5201 West 84th Street, Indianapolis,

Indiana 46201

County: Marion SIC Code: 3713

Operation Permit No.: 097-12373-00256
Permit Reviewer: Kevin Leone

On August 8<sup>th</sup>, 2000, the Office of Air Management (OAM) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Altec Industries, Inc. had applied for a Minor Source Operating Permit (MSOP) for the operation of coating metal truck parts. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 28<sup>th</sup>, 2000, Global Environmental Solutions, Inc. submitted comments on behalf of Altec Industries, Inc. on the proposed MSOP permit. The summary of the comments is as follows:

Altec Industries, Inc. submitted three comments requesting edits to the draft permit concerning discrepancies which are administrative in nature. Altec Industries, Inc. submitted one comment requesting a rule not be applicable.

The following changes will be made to the final MSOP:

## Comment 1:

Section A.1

Altec Industries, Inc. requests that the word "engine" will be deleted from the first line.

## **Response to Comment 1:**

In Section A.1, the word "engine" will be deleted from the first line because engine parts are not coated at this facility. The permit will be changed as follows:

The Permittee owns and operates a facility which coats metal truck engine parts.

## Comment 2:

Section A.2, Numbers 1,2, and 3

Altec Industries, Inc. requests that the wording in the second line of each condition be changed from "...a

Altec Industries, Inc.
Page 2 of 3
Indianapolis, Indiana
Permit No. T097-12373-00256

Permit Reviewer: Kevin Leone

maximum capacity of 0.89 gal/hr..." to "...an average capacity of 0.89 gal/hr..."

## **Response to Comment 2:**

The information in Sections A.1 through A.4 is descriptive information and does not constitute enforceable conditions; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2. Because these are not enforceable conditions, no change was made as a result of this comment.

## Comment 3:

Section C.2

Altec Industries, Inc. requests that section C.2, which requires a preventative maintenance plan, be removed from the permit.

## **Response to Comment 3:**

The preventative maintenance plan will not be required by the source unless it is specifically requested in a Section D condition. The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. No change was made as a result of this comment.

## Comment 4:

Section D.1.1

Altec Industries, Inc. requests removing the words "P=process weight rate of less than 100 pounds/hour."

## **Response to Comment 4:**

If the facility is subject to 326 IAC 6-3, and its process weight rate is less than 100 lbs./hour, it must meet the allowable emission rate for a process weight rate of 100 lbs/hour. The OAM believes this is a logical interpretation of the rule. It also allows individual small facilities that are subject only to 326 IAC 6-3 and general opacity rules to be treated as unlisted insignificant activities. This is now set out in condition C.2.

In addition, the OAM and ERMD believe that D.1 should include standard paint overspray monitoring conditions. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM and ERMD believe that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. In addition, evidence of deposition on the rooftops or the ground strongly implies increased particulate matter emissions into the air. The following will be added to D.1:

## D.1.5 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 01, 02, and 03 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Comment 5:

Section D.1.3

Altec Industries, Inc. requests that section D.1.3, which requires a preventative maintenance plan, be removed from the permit.

## **Response to Comment 5:**

The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. No change was made as a result of this comment.

The following changes will also be reflected in the table of contents as follows:

## **Emission Limitations and Standards**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

## **Compliance Determination Requirements**

- D.1.4 Volatile Organic Compounds (VOC)
- D.1.5 Testing Requirements

## **Record Keeping and Reporting Requirements**

- D.1.6 Record Keeping Requirements
- D.1.7 Reporting Requirements

changed to:

## **Emission Limitations and Standards**

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

## **Compliance Determination Requirements**

- D.1.2 Volatile Organic Compounds (VOC)
- D.1.3 Testing Requirements

## **Record Keeping and Reporting Requirements**

- D.1.4 Record Keeping Requirements
- D.1.5 Reporting Requirements

## Indiana Department of Environmental Management Office of Air Management and Indianapolis Environmental Resources Management Division

## Technical Support Document (TSD) for a Minor Source Operating Permit and New Source Construction

## **Source Background and Description**

Source Name: Altec Industries, Inc.

Source Location: 5201 West 84<sup>th</sup> Street, Indianapolis, IN

County: Marion SIC Code: 3479

Operation Permit No.: 097-12373-00256 Permit Reviewer: Kevin Leone

The Office of Air Management (OAM) has reviewed an application from Altec Industries, Inc. relating to the construction and operation of metal parts coating.

## **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Paint Booth, identified as PB 01, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 01. Installed 1991.
- (b) One (1) Paint Booth, identified as PB 02, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 02. Installed in 1993.
- (c) One (1) Paint Booth, identified as PB 03, equipped with an air atomization spray coating gun, with a maximum capacity of 0.89 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack 03. Not yet installed.

## **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

## **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 915299-01, issued on January 7<sup>th</sup>, 1991;

All conditions from previous approvals were incorporated into this permit.

## **Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
01	Spray Booth PB-1	32	4	50,000	ambient
02	Spray Booth PB-2	32	4	50,000	ambient
PBS-3A	Spray Booth PB-3	35	3.5	25,900- 30,790	70-170
PBS3B	Spray Booth PB-3	35	3.5	25,900- 30,790	70-170
PBS-3C	Spray Booth PB-3	35	3.5	25,900- 30,790	70-170
PBS-3D	Spray Booth PB-3	35	3.5	25,900- 30,790	70-170

## **Enforcement Issue**

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on July 8<sup>th</sup>, 1999.

## **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (4 pages).

## **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	1.62
PM-10	1.62
SO <sub>2</sub>	negligible
VOC	32.1
CO	negligible
NO <sub>x</sub>	negligible

HAP's	Potential To Emit (tons/year)
Methyl Isobutyl Ketone	2.88
Methyl Ethyl Ketone	2.88
Toluene	0.88
Xylene	0.88
TOTAL	7.52

- (a) The potential to emit is less than 100 tons per year of VOC, therefore the source is not subject to the provisions of 326 IAC 2-7. This source is above 25 tons per year potential to emit for VOC's, therefore qualifies for a Minor Source Operating Permit (MSOP).
- (b) The potential to emit is less than 10 tons for individual HAP and less than 25 tons for a combination of HAPs, therefore the source is not subject to the provisions of 326 IAC 2-7.

## **Actual Emissions**

No previous emission data has been received from the source.

## **Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

		Limited Potential to Emit (tons/year)											
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	СО	NO <sub>x</sub>	HAPs						
Paint Booth PB 01				>2.74*									
Paint Booth PB 02				>2.74*									
Paint Booth PB 03				>2.74*									
Total Emissions				>8.22									

<sup>\*</sup> Limit is in effect to keep facilities under 15 pounds per day to avoid 8-2-9.

## **County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Maintenance
NO <sub>2</sub>	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## **Federal Rule Applicability**

- (1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## State Rule Applicability - Entire Source

## 326 IAC 2-4.1 (New Source Toxics Control)

326 IAC 2-4.1 (New Source Toxics Control) is not applicable because the facility does not meet the definition of a major source; the potential emissions for HAPs are less than 10 tons per year for a single HAP and less than 25 tons per year for combined HAPs.

## 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

There are no PSD requirements applicable to this source because it does not meet the definition of a major PSD source as defined in 326 IAC 2-2-1; it is not one of the 28 listed sources, and has a potential to emit for VOC of less than 250 tons.

## 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15th of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

## 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Individual Facilities

## 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), shall not be applicable to the paint booths (PB 01-03) because these booths have actual emissions before controls limited to less than 15 pounds per day of VOC.

## 326 IAC 6-1-1 (Particulate Rules)

326 IAC 6-1-1 (Particulate Rules), shall not be applicable to this source because the potential to emit for particulate matter is less than 100 tons and the actual emissions are less than 10 tons.

## 326 IAC 6-1-12 (Particulate Emission Limitations in Marion County)

Pursuant to 326 IAC 6-1-12 (Particulate Emission Limitations in Marion County), this rule is not

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Altec Industries, Inc Indianapolis, Indiana Permit Reviewer: Kevin Leone

applicable to this source because this source is not identified in this rule.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the paint booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission of 0.55 pounds per hour; and  $P =$  process weight rate of less than 100 pounds/hour

The dry filters shall be in operation at all times the paint booth is in operation, in order to comply with this limit. The baghouse shall be in operation at all times the sandblaster is in operation, in order to comply with this limit.

## **Compliance Monitoring**

Compliance Monitoring is not necessary for the Paint Booths PB 01-03 because there are no applicable NSPS or NESHAP requirements and allowable emissions for particulate matter are less than 10 tons per year.

## Conclusion

The operation of this metal parts coating operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-12373-00256.

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### Appendix A: Emissions Calculations VOC and Particulate From Surface Coating Operations

Company Name: Altec Industries, Inc.

Address City IN Zip: 5201 West 86th Street, Indianapolis, Indiana 46203

SIC: 3621

Vent ID: Emission Unit #01-03 Reviewer: K Leone

Date: July 2000

PB-01

1501																
Material	Density (Lb/Gal)	Weight % Volatile	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon	Pounds VOC per gallon	Potential VOC pounds	Potential VOC pounds	Potential VOC tons	Particulate Potential	lb VOC /gal	Transfer Efficiency
	(==:-	(H20&				(solids)	(3======)	(4	of coating	of coating	per hour	per day	per year	ton/yr	solids	
		Organics)							less water							
Sherwin-Williams Primer	9.86	35.5%	0.0%	35.5%	0.0%	25.8%	3.4000	0.12	3.50	3.50	1.43	34.27	6.26	2.84	13.57	75%
Sherwin-Williams Paint Mix	11.73	29.3%	0.0%	56.0%	0.0%	18.7%	3.1000	0.12	5.03	6.57	2.44	58.65	10.70	3.38	35.13	75%
Gavlon Primer Mix	11.95	28.0%	0.0%	28.0%	0.0%	66.4%	1.1000	0.12	5.85	3.35	0.44	10.60	1.93	1.24	5.04	75%
Deck Coating Durabak	7.22	32.0%	0.0%	32.0%	0.0%	25.8%	1.0000	0.12	2.31	2.31	0.28	6.65	1.21	0.65	8.96	75%
Sealent Sikaflex IA	10.56	7.4%	0.0%	56.0%	0.0%	18.7%	0.2500	0.12	5.03	5.91	0.18	4.26	0.78	0.32	31.62	75%
Underbody Paint Shield	10.68	4.1%	0.0%	4.1%	0.0%	66.4%	0.2500	0.12	5.85	0.44	0.01	0.32	0.06	0.34	0.66	75%
Equipment Cleaning Solvent	6.44	65.0%	0.0%	65.0%	0.0%	66.4%	2.0000	0.12	5.85	4.19	1.00	24.11	4.40	0.59	6.30	75%

State Potential Emissions based upon worst case coating, maximum units per hour and 8,760 hours/yr

(1) Data from Mfr's sheet

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water) Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs) Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs) Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) \* (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer efficiency was estimated at 75% for flat surface work and electrostatic air atomized, per "Air Pollution Engineering Manual" (AP-40), Table 2, page 362, 1992 edition.

1 D-02																
Material	Density	Weight %	Weight %	Weight %	Volume %	Volume %	Gal of Mat	Maximum	Pounds VOC	Pounds VOC	Potential	Potential	Potential	Particulate	Ib VOC	Transfer
	(Lb/Gal)	Volatile	Water	Organics	Water	Non-Vol	(gal/unit)	(unit/hour)	per gallon	per gallon	VOC pounds	VOC pounds	VOC tons	Potential	/gal	Efficiency
		(H20&		-		(solids)			of coating	of coating	per hour	per day	per year	ton/yr	solids	
		Organics)							less water	_		' '				
Sherwin-Williams Primer	9.86	35.5%	0.0%	35.5%	0.0%	25.8%	3.4000	0.20	3.50	3.50	2.38	57.12	10.43	4.74	13.57	75%
Sherwin-Williams Paint Mix	11.73	29.3%	0.0%	56.0%	0.0%	18.7%	3.1000	0.20	5.03	6.57	4.07	97.74	17.84	5.63	35.13	75%
Gavlon Primer Mix	11.95	28.0%	0.0%	28.0%	0.0%	66.4%	1.1000	0.20	5.85	3.35	0.74	17.67	3.22	2.07	5.04	75%
Deck Coating Durabak	7.22	32.0%	0.0%	32.0%	0.0%	25.8%	1.0000	0.20	2.31	2.31	0.46	11.09	2.02	1.08	8.96	75%
Sealent Sikaflex IA	10.56	7.4%	0.0%	56.0%	0.0%	18.7%	0.2500	0.20	5.03	5.91	0.30	7.10	1.30	0.54	31.62	75%
Underbody Paint Shield	10.68	4.1%	0.0%	4.1%	0.0%	66.4%	0.2500	0.20	5.85	0.44	0.02	0.53	0.10	0.56	0.66	75%
Equipment Cleaning Solvent	6.44	65.0%	0.0%	65.0%	0.0%	66.4%	2.0000	0.20	5.85	4.19	1.67	40.19	7.33	0.99	6.30	75%

State Potential Emissions based upon worst case coating, maximum units per hour and 8,760 hours/yr

(1) Data from Mfr's sheet

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Galion Coating = (Density (luigal) \*Weight \*Organics) ("Pounds of VOC per Galion Coating = (Density (luigal) \*Weight \*Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Galion coating (luigal) \*Gal of Material (gal/unit) \*Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Galion coating (luigal) \*Gal of Material (gal/unit) \*Maximum (units/hr) \*(24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs) Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer efficiency was estimated at 75% for flat surface work and electrostatic air atomized, per "Air Pollution Engineering Manual" (AP-40), Table 2, page 362, 1992 edition.

PB-03																
Material	Density	Weight %	Weight %	Weight %	Volume %	Volume %	Gal of Mat	Maximum	Pounds VOC	Pounds VOC	Potential	Potential	Potential	Particulate	Ib VOC	Transfer
	(Lb/Gal)	Volatile	Water	Organics	Water	Non-Vol	(gal/unit)	(unit/hour)	per gallon	per gallon	VOC pounds	VOC pounds	VOC tons	Potential	/gal	Efficiency
		(H20&		-		(solids)			of coating	of coating	per hour	per day	per year	ton/yr	solids	
		Organics)							less water			' '		,		
Sherwin-Williams Primer	9.86	35.5%	0.0%	35.5%	0.0%	25.8%	3.4000	0.20	3.50	3.50	2.38	57.12	10.43	4.74	13.57	75%
Sherwin-Williams Paint Mix	11.73	82.5%	0.0%	56.0%	0.0%	18.7%	3.1000	0.20	5.03	6.57	4.07	97.74	17.84	1.39	35.13	75%
Gavlon Primer Mix	11.95	28.0%	0.0%	28.0%	0.0%	66.4%	1.1000	0.20	5.85	3.35	0.74	17.67	3.22	2.07	5.04	75%
Deck Coating Durabak	7.22	32.0%	0.0%	32.0%	0.0%	25.8%	1.0000	0.20	2.31	2.31	0.46	11.09	2.02	1.08	8.96	75%
Sealent Sikaflex IA	10.56	7.4%	0.0%	56.0%	0.0%	18.7%	0.2500	0.20	5.03	5.91	0.30	7.10	1.30	0.54	31.62	75%
Underbody Paint Shield	10.68	4.1%	0.0%	4.1%	0.0%	66.4%	0.2500	0.20	5.85	0.44	0.02	0.53	0.10	0.56	0.66	75%
Equipment Cleaning Solvent	6.44	65.0%	0.0%	65.0%	0.0%	66.4%	2.0000	0.20	5.85	4.19	1.67	40.19	7.33	0.99	6.30	75%

State Potential Emissions based upon worst case coating, maximum units per hour and 8,760 hours/yr.

(1) Data from Mfr's sheet

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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Transfer efficiency was estimated at 75% for flat surface work and electrostatic air atomized, per "Air Pollution Engineering Manual" (AP-40), Table 2, page 362, 1992 edition

Appendix A: Emissions Calculations HAP Emission Calculations

From Surface Coating Operations

Company Name: Altec Industries, Inc.

Address City IN Zip: 5201 West 86th Street, Indianapolis, Indiana 46203

Vent ID: Emission Unit #01-03

Reviewer: K Leone Date: July 2000

Material	Density	Gal of Mat	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	2-Butoxyeth-	Methyl Ethyl	Glycol Ethers	Toluene	Xylene	Methyl Isobutyl	Benzene	Ethylbenzene	Total Potential
	(Lb/Gal)	(gal/unit)	(unit/hour)	2-Butoxyethanol	Methyl Ethyl	Glycol Ethers	Toluene	Xylene	Methyl Isobutyl	Benzene	Ethylbenzene	onal (ton/yr)	Ketone	(ton/yr)	(ton/yr)	(ton/yr)	Ketone	(ton/yr)	(ton/yr)	per coating
				(glycol ether)	Ketone				Ketone			(glycol ether)	(ton/yr)				(ton/yr)			(tons/yr)
Sherwin-Williams Primer	9.86	3.4000	0.12	0.0%	5.0%	0.0%	5.0%	5.0%	5.0%	0.0%	0.0%	0.00	0.88	0.00	0.88	0.88	0.88	0.00	0.00	3.52
Sherwin-Williams Paint Mix	11.73	3.1000	0.12	0.0%	5.0%	0.0%	2.0%	2.0%	5.0%	0.0%	0.0%	0.00	0.96	0.00	0.38	0.38	0.96	0.00	0.00	2.68
Gavlon Primer Mix	11.95	1.1000	0.12	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.14	0.07	0.00	0.00	0.00	0.21
Deck Coating Durabak	7.22	1.0000	0.12	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.08	0.04	0.00	0.00	0.00	0.11
Sealent Sikaflex IA	10.56	0.2500	0.12	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.03	0.01	0.00	0.00	0.00	0.04
Underbody Paint Shield	10.68	0.2500	0.12	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.03	0.01	0.00	0.00	0.00	0.04
Equipment Cleaning Solvent	6.44	2.0000	0.12	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.14	0.07	0.00	0.00	0.00	0.20

<sup>\*</sup> Determine Potential HAPs at Limited PTE: 249 tons VOC/yr x yr/292.31 tons VOC x 32.6 ton HAP = 27.77 tons HAP State Potential Emissions based upon worst case HAP loading and 8,760 hr/yr.

### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

## Appendix A: Emissions Calculations VOC and Particulate From Surface Coating Operations

Company Name: Altec Industries, Inc.

Address City IN Zip: 5201 West 86th Street, Indianapolis, Indiana 46203

Vent ID: Emission Unit #01-03

Reviewer: K Leone Date: July 2000

							HAPS	HAPS
	PM	PM-10	SO2	NOx	CO	VOC	Single	Combination
Paint Booths EU 01	0.32	0.32	0	0	0	10.70	0.96	3.52
Paint Booths EU 02	0.65	0.65	0	0	0	10.70	0.96	3.52
Paint Booths EU 03	0.65	0.65	0	0	0	10.70	0.96	3.52
Total Emissions	1.62	1.62	0	0	0	32.10	2.88	10.56